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LETTER AND CONCURRENCE FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING FINAL RCRA FACILITY INVESTIGATION ADDENDUM SOLID
WASTE MANAGEMENT UNITS 8, 9, 11 AND 51 (SWMU8) (SWMU9) (SWMU11) (SWMU51)

NS MAYPORT FL

8/27/2012

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

August 27, 2012

Naval Facilities Engineering Command Southeast
Attn: Mr. Dana Hayworth (OPUE3)
135 Ajax Street North, Building 135
Naval Air Station Jacksonville
Jacksonville, Florida 32212-0030

**RE: Final Resource Conservation and Recovery Act Facility Investigation
Addendum, SWMUs 8, 9, 11, and 51, Naval Station Mayport, USEPA ID #FL9
170 024 260, Mayport, Florida (Tetra Tech, August 8, 2012)**

Dear Mr. Hayworth:

I have reviewed the subject document which was dated June 2012 and was re-received on August 8, 2012 by email due to the original CD submittal being corrupted. This report was prepared under Contract Task Order Number 0033. According to the document *"Tetra Tech NUS, Inc. (Tetra Tech) has prepared this Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Addendum to summarize recent field activities conducted to complete the RFI for Solid Waste Management Units (SWMUs) 8, 9, 11, and 51 located at Naval Station (NAVSTA) Mayport, Jacksonville, Florida."* Also, *"The objective of the RFI Addendum for SWMUs 8, 9, 11, and 51 was to complete the RFI by performing the following: 1) Identify and define the extent of contaminated soils and identifying potential source areas in connection with SWMUs 8, 9, 11, and 51 that exceed applicable Florida Department of Environmental Protection (FDEP) regulations, 2) Characterize the extent of groundwater contamination related to SWMUs 8, 9, 11, and 51 that exceeds regulatory criteria, and 3) Collect supporting data to evaluate potential risk at the site and make recommendations for subsequent corrective actions."*

In the Conclusions and Recommendations section of this report it states *"The RFI Addendum soil sampling results indicate the extent of soil impacts exceeding applicable SCTLs and/or BSVs (Background Screening Values) has been defined for each SWMU."* This section of the report goes on to state *"The RFI Addendum groundwater sampling results indicate the movement of groundwater impacts is stable and not migrating to the St. Johns River. Land use controls and groundwater use restrictions are maintained at these SWMUs, and continued periodic groundwater monitoring is sufficient to monitor the potential threat to human or*

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SWMUs 8, 9, 11 and 51, Naval Station Mayport
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ecological receptors." The recommendation section in the report states "The recommendation for SWMUs 8, 9, 11, and 51 is to proceed with a Corrective Measures Study to define the most appropriate corrective action."

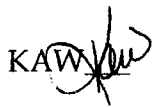
In May 2012, Tetra Tech issued a Response to Comments letter pertaining to FDEP's response to document letter concerning the Draft-Final RFI Addendum for these SWMUs. Their response stated that *"In the March 2012 NAVSTA Partnering Meeting the team discussed and approved addressing the data gaps with limited additional soil sampling. The information gathered from this effort will be reported in the Corrective Measures Study (CMS). Data gaps will be filled and the soil contamination delineated prior to completing the CMS. Additionally, the team agreed that the RFI Addendum can be issued final as is."* Based on these statements, I am in concurrence with the stated recommendation in this Final RFI Addendum which is to proceed to a CMS to define the most appropriate corrective action.

Thank you for the opportunity to review this document. If you require additional clarification or other assistance, please feel free to contact me at 850/245-8999.

Sincerely,



John Winters, P.G.
Remedial Project Manager
Federal Programs Section



KAW

cc Tim Bahr, FDEP, Tallahassee